

Massimo Gammella
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U.S. DISTRICT COURT
E.D.N.Y.

New York April 19, 2024

Magistrate Judge Steven I. Locke
The Honorable Natasha C. Merle
United State District Court
Eastern District of New York
100 Federal Plaza
Central Islip, New York 11722

Re: Hernandez et al v. Rosso Uptown, Ltd et al Case 2:20-cv 04026-JMA-SIL

Motion to dismiss for failure to comply with court rules and deadlines.

Dear Judge Locke,

I am writing to bring to your attention a matter of repeated concern regarding the conduct of the plaintiffs' lawyer in the above-mentioned case.

On our last conference held on April 10, 2024 you specifically instruct Mr. Moser to draft a pre trial order and send it to us via email no later than April 18, 2024, it is with regret that I must address to you that Mr. Moser once again failed to comply, this is an ongoing pattern of missed conferences and deadlines that have occurred on several occasion, this behavior undermines the integrity of the court system and does not allow a fair and timely resolution.

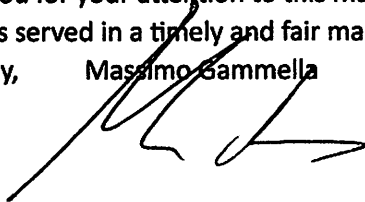
This is not the first instance in which the plaintiffs' lawyer has failed to adhere to the deadlines imposed by the court. Despite the clear directives set forth by your honor, his consistent neglect of these obligations persists, causing undue delays and inconvenience to all parties involved. Such behavior not only reflects poorly on the lawyer's professionalism but also disrespects authority of the court and the principles of justice it upholds.

It is my firm belief that accountability must be upheld in the legal profession, and repeated instances of negligence should not go unchecked. The failure to meet court deadlines not only disrupts the proceedings but also undermines the faith of the public in the efficacy of the legal system.

Therefore, I respectfully request that Your Honor takes appropriate action to address this matter and consider dismissing the case due to the persistent failure of the plaintiff's lawyer to meet the court's deadlines. Such a decision would serve to uphold the integrity of the court and reinforce the importance of compliance with legal obligations.

Thank you for your attention to this matter, I trust Your Honor will take the necessary steps to ensure justice is served in a timely and fair manner.

Sincerely, Massimo Gammella



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LONG ISLAND OFFICE

~~CHAMBER OF~~
~~THE HONORABLE JUDGE~~
~~CLIFFORD S. BARNKUPFICZ JUDGE~~
~~EVERETT DISTRICT COURT NEW YORK~~
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VRGEM

MAGISTRATE JUDGE

STEVEN I. LOCKE

HONORABLE NASTASHA C. WELLS

RE: HERNANDEZ ET AL V. ROSA UPON MOTION
ET AL CASE NO. 20-20-CV-04026

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PRO SE DEFENDANT: MASHU. GABRIELINA